

# Drug and Crime Control Division

## 2013 Grant Management Training

# Agenda

- OJP Financial Guide
- Award Special Conditions
- Reporting Requirements
- Reimbursement
- Project Modification Requests
- Procurement
- Travel Policy
- Program Income
- Confidential Funds
- Closeout
- Record Keeping
- Compliance Monitoring

# OJP Financial Guide

- It is the responsibility of the subgrantee to comply with the federal guidelines contained in these circulars.
  - Financial Guide  
<http://www.ojp.gov/financialguide/index.htm>
  - OMB Circulars  
<http://www.whitehouse.gov/OMB/circulars/index.html>

# Award Special Conditions

- Civil Rights Policy
  - Agencies policy must conform with federal Civil Rights Laws
  - Additional training and information from ICJI in the future



# Award Special Conditions

- Non-supplanting
  - Funds cannot be used to supplant state or local funds.
- Dual Project Funding
  - If other awards are received for your program, the awards cannot be used to cover the same costs
- Asset tracking
  - Property or Equipment with a value of \$500 or more
  - Purchased in whole or in part with grant funds.
  - Must be reported to ICJI following the quarter in which they were acquired.



# Award Special Conditions

- Use of Federal Funds
  - Cannot be used to support modification or implementation of laws or policy at any level of government without prior approval
- Reporting fraud, waste, abuse or misconduct to  
USDOJ Office of the Inspector General

Office of Inspector General  
U.S. Department of Justice  
Investigations Division  
950 Pennsylvania Ave. N.W.  
Room 4706  
Washington, D.C. 20530

Email: [oig.hotline@usdoj.gov](mailto:oig.hotline@usdoj.gov)

Phone hotline: (800) 869-4499

Fax hotline: (202) 616-9881

Additional information is available from the DOJ OIG website at [www.usdoj.gov/org](http://www.usdoj.gov/org)

# Award Special Conditions

- Trainings or training materials
  - Must adhere to OJP Training Guidelines
  - <http://www.ojp.gov/funding/ojptrainingguidingprinciples.htm>
- Technology Initiatives
  - Must use existing technology or networks as the communication backbone
- Task Force Law Enforcement Training
  - Each member of a law enforcement TF must complete online training through BJA's CTFIL
  - Within 120 days of the award
  - [www.ctfli.org](http://www.ctfli.org)

# Reporting Requirements

- Types of required reports
  - Cumulative Fiscal Report
  - Program Report
  - Inventory Reports
  - BJA Performance Measurement Tool (PMT)



# Reporting Requirements

- E-Grants
  - Cumulative Fiscal Report
    - Fiscal reports will generate the invoice used for reimbursement
    - Interim Fiscal Reports can be submitted throughout the grant period to request reimbursement at any time
    - Includes the Program Income Report

# Reporting Requirements

- Program Report
  - Includes performance data not already collected in the PMT
- Fiscal and Program Reports are due quarterly
  - April 20<sup>th</sup>
  - July 20<sup>th</sup>
  - October 20<sup>th</sup>
  - January 20<sup>th</sup>

# Reporting Requirements

- E-Grants
  - Inventory Report
    - Report of all assets purchased either fully or in part with grant funds and valued at \$500.00 or more per unit
  - Inventory Reports are due 60 days before the end of the grant period.
  - They can be completed at any time during the grant period.

# Reporting Requirements

- BJA Performance Measurement Tool (PMT)
  - Required reporting for the federal government.
  - A username and password will be sent with the grant award packet.
  - Due quarterly
    - April 15<sup>th</sup>
    - July 15<sup>th</sup>
    - October 15<sup>th</sup>
    - January 15<sup>th</sup>



# Reimbursement

- All payments are made in arrears by electronic funds transfer to the Recipient Agency listed in the grant application.
- No payments are made in advance of receipt of the goods or services.
- Fiscal reports that have been approved will be used to reimburse the subgrantee.

# Reimbursement

- Supporting Documentation
  - Documentation to support the receipt of goods or services must be submitted with all Fiscal Reports to receive reimbursement.
  - The documentation must clearly show the amount and the date of work or purchase.
  - The documentation must be easy for the program manager to read and understand.

# Reimbursement

- Examples of Supporting Documentation
  - Time Sheets
  - Travel Logs
  - Receipts
  - Invoices
  - Auditor Ledgers



# Project Modification Request

- Project Modification Request (PMR)
  - Modifies the grant award in the following circumstances.
    - Change in approved budget
    - Addition funds added to the project
    - Change in the scope of the project
    - Change of the project end date
    - Change in any grant contact information



## Project Modification Request

- Requests to extend the end date must be submitted 60 days before the award is scheduled to end.
- All other requests must be submitted 30 days before the award is scheduled to end.
- All PMRs must be approved by ICJI before obligations can be made.

# Program Income

- All income generated as a direct result of the fully or partially funded program is deemed program income
- Federal portion of the program income must be accounted for at the same ratio of ICJI grant funds to total project budget

# Program Income

- Rules:
  - Accounted for and used within the award period
  - Expenditures must be allowable under the grant
  - Reduce the total cost and/or expand the project
- Must be expended prior to grant funds
- Program income not expended by the award end date will revert to ICJI

# Program Income

- Reporting
  - Reported quarterly with Fiscal Reports.
    - Earned
    - Expended
- Equitable Sharing Agreement Rules
  - It is the responsibility of your agency to follow guidelines in the agreement and in the grant.



# Confidential Funds

- Funds allocated to:
  - Purchase Services
    - Services for undercover purposes.
  - Purchase of Evidence
    - Evidence or contraband purchases to prove existence of a crime.
  - Purchase of Specific Information
    - Payment of money to informants.

# Confidential Funds

- Confidential Funds Certificate
  - Must be signed and submitted to ICJI by subgrantees approved to use confidential funds.
- Written Procedures
  - Each agency authorized to disburse confidential funds must develop and follow internal procedures for disbursement.
  - Elements required are outlined in the DCCD Policy and Procedures Manual.

# Confidential Funds

- Accounting and Control Procedures
  - Special Accounting and Control procedures are listed in the DCCD Policy and Procedure Manual.
  - It is important to follow the procedures as outlined to govern the use of the funds.
  - The procedures should be documented and followed and be made available upon request by ICJI.

# Closeout

- Subgrantees must submit all required closeout documentation and reports within **45 days** of the end date.
  - Final Cumulative Fiscal Report
  - Supporting documentation for reimbursement
  - Subgrants can be closed prior to the end date with ICJI approval
- Refunds
  - Subgrantees with matching requirements may be subject to a refund of grant funds if required match is not expended.



# Procurement

- Procurement policies apply to:
  - Purchase of goods or services
  - Maintenance and disposing of assets
  - All procurement is to be conducted in a manner to provide maximum open and free competition
- Subgrantees should use their agency's procurement policy when utilizing grant funds
  - The policy must be made available to ICJI upon request
  - Agencies without a procurement policy should follow state guidelines
  - <http://www.in.gov/idoa/2354.htm>

# Procurement

- State policy (minimal requirements)
  - Request for Proposal should be released for project/activity expected to cost over \$50,000
  - Sole Source Procurement
    - Can be used when only one vendor/contractor meets the needs of the activity, or
    - After solicitation from at least three sources reveals inadequate competition
    - Any sole source contract in excess on \$50,000.00 must receive prior approval
    - Allow time for approval process

# Procurement

- Maintenance
  - Property and Equipment
    - Any item purchased with grant funds is considered State property.
  - Subgrantees are responsible for replacing or repairing property that is lost, stolen, damaged, or destroyed.

# Procurement

- Records must be maintained for items valued at \$500.00 or more per unit AND with the useful life of more than one year and should include the following:
  - Description
  - Identification or Serial Number
  - Title Holder
  - Acquisition Date
  - Cost
  - % of Federal participation in cost
  - Location
  - Use and Condition of Property
  - Disposition data



# Procurement

- Disposition of Property or Equipment
  - When equipment is no longer needed for the program, the value of the item(s) determines the process of disposition
    - Items with a fair market value of **less than \$500.00** may be retained, sold or disposed per State policy
      - <http://www.in.gov/idoa/2365.htm>
    - If sold: report income from sale to ICJI as program income

# Procurement

- Disposition of Property or Equipment
  - When equipment is no longer needed for the program, the value of the item(s) determines the process
    - Items with a fair market value of **\$500.00 or more** must receive prior approval by ICJI to:
      - Use the property in other federally sponsored projects with similar purposes,
      - Transfer the property to another project authorized for support by the state, or
      - Return the property to ICJI.

# Procurement

- Contractor Rates
  - Compensation for consultant may not exceed \$450 per 8-hour day, or \$56.25 per hour.
  - Any consultant rates in excess of \$450 per 8-hour day, or \$56.25 per hour must get prior approval ICJI.

# Travel Policy

- Travel costs are allowable for employees who are in travel status on official business.
- Travel expenses will be reimbursed according to the State's travel policy unless the subgrantee's travel policy is more restrictive.
  - <http://www.in.gov/idoa/2459.htm>
  - The travel policy must be made available to ICJI upon request.



# Conferences and Trainings

- Conference trainings must adhere to ICJI's and OJP's policy to prevent excessive expenditures.
  - Trainings using \$10,000 or more of grant funds must complete ICJI's follow-up report
- Food and beverage purchases not allowed

# Record Keeping

- Grant File:
  - All subgrantees must maintain a grant file including:
    - CJI Grant Agreement
    - Award Letter
    - Job Descriptions (if grant funds are used for personnel expenses)
    - Electronic access to:
      - Application
      - Supporting Documentation
      - Correspondence

# Record Keeping

- Grant File
  - All subgrantees must maintain a grant file including:
    - Copies of contracts
    - MJTF MOU's
    - Problem Solving Court Policy and Procedure Manual
    - Program Income records
    - Confidential Funds Certificate
    - Confidential Funds Expenditure Records

# Recording Keeping

- Other Required Documentation
  - The following is a list of documentation that must be made available to ICJI upon request:
    - Equal Employment Opportunity Plan
    - Accounting Records
      - Documentation of separate accounts being kept for grant funds and program income
    - Most Recent A-133 Audit
    - Procurement Policy
    - Travel Policy
    - Disposition Policy
    - Confidential Informant Files



# Record Keeping

- Retention
  - All grant records/documentation must be kept by the subgrantee for at least three years following the close of the most recent audit report.
  - State and local units of government may impose record retention and maintenance requirement in addition to those required.

# Compliance Monitoring

- Periodic reviews of awarded programs should be expected by the subgrantees.
  - Site Visits
    - ICJI Staff will travel to the location of the program to review the following:
      - Grant File
      - Performance Data
      - Program in Progress
  - Desk Review
    - ICJI Staff will request that the subgrantee mail or email all required documentation for review.

# Questions

- Program Contact Information
  - Megan Compton, Division Director
    - [mlcompton@cji.in.gov](mailto:mlcompton@cji.in.gov), 317-234-1653
  - Terrie Grantham, Program Manager
    - [tgrantham@cji.in.gov](mailto:tgrantham@cji.in.gov), 317-232-1230
  - Beth Hampshire, Program Manager
    - [bhampshire@cji.in.gov](mailto:bhampshire@cji.in.gov), 317-233-3789